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NEPA Determination for Operable Unit 4 Interim Measure/Interim Remedial Action

Frazer Lockhart, Solar Ponds Program Manager, Environmental Restoration

In response to your memo of December 23, 1993, I have reviewed the Action Description Memorandum (ADM) for the Solar Ponds Interim Measure/Interim Remedial Action (IM/IRA) proposal. I do not believe that the actions described in the ADM qualify for any of the categorical exclusions listed in 10 CFR 1021, Appendix B. Although the time period and cost of the interim action are not described in the ADM, I suspect that the activity would exceed the limits of one year and \$1 million to qualify as a removal action. In addition, I do not believe that Rocky Flats could in good faith propose that the excavation of 100,000 to 133,000 cubic yards of material from the plant site to provide fill for the project would not have an environmental impact. Therefore, I recommend that an environmental assessment be incorporated into the IM/IRA document to determine whether the proposal would have significant environmental impacts. I will be sending an environmental assessment determination to EH-25 through you for concurrence in the very near future.

Patricia M. Powell
NEPA Compliance Officer

CORRES CONTROL X X PATS/T130G ADMN RECORD/080 2 cc:

M. Witherill, RFO G. Hill, RFO P. M. Powell, RFO S. M. Nesta, EG&G

Reviewed for Addressee Corres. Control RFP

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